

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT COURT OF
DELAWARE

KENNETH REYNOLDS and
JOAN CHIEN, husband and wife,

Plaintiffs,

V.

STATE FARM MUTUAL AUTOMOBILE
INSURANCE COMPANY,

Defendant

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C.A. No.: 07-cv-176

ORDER

AND NOW, this _____ day of _____, 2007 upon consideration of Plaintiff's Motion for An Extension of Time to Enter Local Counsel, and any response thereto, it is hereby ORDERED and DECREED that Plaintiff's motion is GRANTED. Local Counsel for Plaintiff's shall enter their appearance by _____.

J.

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MOTION FOR AN EXTENSION OF TIME TO ENTER LOCAL COUNSEL

Plaintiffs Kenneth Reynolds and Joan Chien, by and through out of state counsel, hereby move this Honorable Court for an Extension of Time to Enter Local Counsel and in support thereof aver:

1. This case was originally brought in the Eastern District of Pennsylvania.
2. By Court Order of the Eastern District, the case was transferred to this Judicial District.
3. This Honorable Court entered an Order requiring all Parties to enter the appearance of local counsel by May 7, 2007.
4. Plaintiffs entered into discussions and/or negotiations with a local counsel and met with that attorney (who is also licensed in Pennsylvania) on more than one occasion.
5. Plaintiffs have just learned that the local counsel whom was to represent them has a potential conflict of interest and is unable to enter his appearance at this time.

WHEREFORE, Plaintiffs request an additional reasonable time to enter the appearance of local counsel.

Respectfully Submitted

/s/Shelly Farber _____

SHELLY FARBER, ESQUIRE
Out of State Attorney for Plaintiffs
2619 West Chester Pike
Broomall, Pa 19008
(610) 356-3900

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CERTIFICATE OF SERVICE

I Shelly Farber, Esquire aver that on May 7, 2007 I caused a true and correct copy of the
attached Motion via mail upon:

Sherry Ruggiero Fallon, Esquire
750 South Madison Street #400
P.O. Box 2092
Wilmington, DE 19899-2092
(Attorney for Defendant)

Respectfully Submitted

/s/Shelly Farber _____

SHELLY FARBER, ESQUIRE
Out of State Attorney for Plaintiffs
2619 West Chester Pike
Broomall, Pa 19008
(610) 356-3900